FOR THE NORTHEASTERN DISTRICT COURT EASTERN DIVISION

APR 1 4 2008

SELENA DAVIS,	MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COU	ROE
Plaintiff,) Case No. 07 C 7264	
v.) Judge Joan B. Gottschall	
CHICAGO BOARD OF EDUCATION AND JUDITH ADAMS,) Magistrate Judge Valdez)	
Defendants.	,)	

NOTICE OF FILING

TO: Patrick J. Rocks
General Counsel
Board of Education of the City of Chicago
125 S Clark Street, Suite 700
Chicago, Illinois 60603

Please take notice that the attached Appearance and Response to Defendant Adam's Motion To Dismiss Title VII and ADEA Claims were filed today with the Clerk of the United States District Court for the Northern District of Illinois.

Dated at Chicago, Illinois this 14th Day of April, 2008.

Respectfully submitted,
J. Christopher Murray
Attorney for Plaintiff
640 N LaSalle Street, Suite 284
Chicago, Illinois 60610-8111
(312) 703-9950

CERTIFICATE OF SERVICE

will cause

I hereby certify that I have caused a true and correct copy of the above and foregoing Notice of Filing and Response to Defendant Adam's Motion To Dismiss Title VII and ADEA Claims to be served upon the attorney of record for Judith Adams at the above listed address via U.S. Mail deposited at 640 N LaSalle Street, Chicago before the hour of 5:00 p.m. on April 14, 2008.

Christopher Murray

UNITED STATES DISTRICT COURT
FOR THE NORTHEASTERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SELENA DAVIS,

Plaintiff,

Case No. 07 C 7264

v.

Judge Joan B. Gottschall

CHICAGO BOARD OF EDUCATION AND
JUDITH ADAMS,

MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

DISTRICT COURT

Magistrate Judge Valdez

RESPONSE TO DEFENDANT ADAM'S MOTION TO DISMISS TITLE VII AND ADEA CLAIMS

Defendants.

Plaintiff Selena Davis responds to **Defendant Judith Adams' Motion To Dismiss Title**VII and ADEA Claims, stating as follows:

Plaintiff does not dispute Adams' claims that individuals are not liable under the ADEA and Title VII, and that Adams served as Plaintiff's supervisor, but not as her employer. Plaintiff does wish to make specific additions to Adams' prayer for relief.

As Adams notes in the introduction section of her motion, Plaintiff filed this complaint pro se. Prior to the filing of an appearance on her behalf today by J. Christopher Murray, she was not able to obtain legal representation. A major factor hindering her in this regard has been her lack of funds which Plaintiff alleges is a proximate result of the wrongful actions of both defendants. Prior to this time, Plaintiff therefore did not have the requisite legal knowledge or access to legal counsel to properly formulate her allegations against either Defendant.

While Plaintiff does not object to the dismissal with prejudice of her claims under Title

VII and the ADEA against Adams, she asks for leave of Court to file an amended petition within

30 days. She also requests that the Court retain personal jurisdiction over Defendant Adams

during this time. Plaintiff believes that if the Court provides such an order, she will be able to file a complaint with a count the Court will find confers federal question jurisdiction against Adams.

Wherefore, Plaintiff respectfully requests that this Court grant her 30 days to file an amended complaint against both defendants, that it retain personal jurisdiction against Defendant Adams during this time, and that it dismiss her ADEA and Title VII claims against Adams with prejudice at any time consistent with the other items of relief requested.

Respectfully submitted,

J. Christopher Murray Attorney for Plaintiff

640 N LaSalle Street, Suite 284 Chicago, Illinois 60610-8111

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